

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Jovan Higgins, AKA,  
As Jany Ward

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Wells Fargo Bank  
Silent Portfolio Service

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No  
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Jovan Higgins  
207 Heywood Ave  
Orange, New Jersey  
07050  
862 703 0451

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Wells Fargo Bank, NA  
 Street Address PO Box  
 County, City San Francisco, CA  
 State & Zip Code \_\_\_\_\_

Defendant No. 2

Name Selma Road Info Services  
 Street Address 3815 SW Temple  
 County, City Salt Lake City, Utah  
 State & Zip Code 84111

Defendant No. 3

Name City of Orange  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Questions ☒ Diversity of Citizenship  
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur?

Orange, New Jersey

B. What date and approximate time did the events giving rise to your claim(s) occur?

between  
the last six months and particularly between 2/19/15  
and present

C. Facts:

What happened to you?

Defendant is an occupant of a property located at 207 Howard Ave, Orange, New Jersey, and complained to Defendants that there was an electrical inspection was requested to restore power and heat to the premises. Defendants refused to permit a city inspector even at occupants own expense and directed city not to inspect.

Who did what?

I called the managing agent, and electrical inspector for the City of Orange and code enforcement for the city. A summons was issued.

Was anyone else involved?

Upon information and belief, the source being the city of Orange, N.J.'s electrical inspector; he was directed not to issue a permit for electrical inspection or to inspect the service pan. Himself.

Who else saw what happened?

The electrical contractor, the code enforcement personnel

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

The home has been cold during the coldest period in New Jersey this year and remains cold with children on the premises - Both adult and minor occupants are cold and susceptible to Influenza because of sub zero temperatures.

Plaintiff is also unable to maintain his work effectively as he would work be done.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

that the court order that the Wells Fargo Bank, their Agent select part of its services be directed to conduct an immediate inspection of the properties electrical service and so that service can be restored to the premises.

that such an order be directed immediately and that Defendants be liable in the amount of 10,000.00 dollars per day beginning from September 2014 to Feb 2015 or until they authorize the required inspection.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24 day of February, 2015.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

J. Higgins  
200 Hollywood Av  
Orange, New Jersey  
07050

862-703-0451

Higgins659@aol.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff:

J. Higgins